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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91204124
Party	Defendant Robert Campbell
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Kuscha Hatami Fard
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Signature	/Kuscha Hatami Fard/
Date	08/16/2012
Attachments	Herbal Treasures.pdf (3 pages)(78848 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE TRADEMARK TRIAL AND APPEAL BOARD

THRESHOLD ENTERPRISES, LTD.,	Opposition No. 91204124
Opposer Vs	Marks: PLANT HERBAL TREASURES
ROBERT CAMPBELL	Serial No. 85396136
Applicant	Published: January 31, 2012

STIPULATED MOTION FOR SUSPENSION OF THE PROCEEDINGS AND TO EXTEND DISCOVERY AND SUBSEQUENT TRIAL DATES

The parties Threshold Enterprises LTD., and Robert Campbell by and through their counsel, hereby stipulate to an extension of the deadlines in this proceeding for a period of ninety (90) days. The deadline to for Expert Disclosures currently is December 8 5, 2012. Applicant requests that such date be extended until March 8, 2013 and that all other dates be reset.

The parties are actively engaged in settlement negotiations concerning this matter and mutually agree that these deadlines be extended for ninety (90) days to allow the parties to continue these efforts. Opposer, Robert Campbell by its attorney of record, Jeremy McLaughlin has consented via email on August 16, 2012 to the extension.

Respectfully submitted,

By: /s/Kusha Hatami Fard

Kuscha Hatami Fard Raj Abhyanker, P.C.

1580 W. El Camino Real, Suite 13

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the **STIPULATED MOTION FOR SUSPENSION OF THE PROCEEDINGS AND TO EXTEND DISCOVERY AND SUBSEQUENT TRIAL DATES** was forwarded by first class mail by depositing the same with the U.S. Postal Service, postage pre-paid, on this 17th day of August, 2012 to the following:

JEREMY M. MCLAUGHLIN ARNOLD & PORTER LLP Three Embaradero Center, 7th Floor San Francisco, CA. 94111

/s/Kuscha Hatami Fard

Kuscha Hatami Fard Raj Abhyanker, P.C. 1580 W. El Camino Real, Suite 13 Mountain View, CA 94040

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